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Attorneys for Plaintiff
 INTUSCARE INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

INTUSCARE INC.,

 Plaintiff,

 v.
 RTZ ASSOCIATES, INC.; and DOES 1
 through 10,

 Defendants.

Case No. 4:24-cv-1132-JST

Assigned to: Hon. Jon S. Tigar

**DECLARATION OF ROBBIE FELTON
 IN SUPPORT OF PLAINTIFF
 INTUSCARE INC.'S MOTION FOR
 PARTIAL SUMMARY JUDGMENT**

Date: June 19, 2025
 Time: 2:00 p.m.
 Courtroom: 6

Complaint Filed: February 23, 2024
 Amended Complaint Filed: April 2, 2024
 Counterclaims Filed: June 20, 2024

DECLARATION OF ROBBIE FELTON

I, Robbie Felton, hereby declare as follows:

1. I am the Founder and CEO of IntusCare Inc. (“Intus”). I make this declaration in support of Plaintiff Intus’ Motion for Partial Summary Judgment. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could testify competently thereto.

2. Both Intus’ and RTZ Associates Inc.’s (“RTZ”) businesses relate to PACE programs.

3. PACE is a Medicare program that provides services to disabled older adults that allow them to continue to live in their communities, rather than having to move to more restrictive institutional settings.

4. Intus synthesizes data from each of the PACE programs’ electronic health records that stores its patients’ electronic health information, and uses that data to identify risks, visualize trends, and optimize patient care.

5. Intus helps PACE programs to improve participants’ safety and provide better care by, for example, helping to track fall risk or changes in acuity, and by employing clinicians to provide clinical and administrative services on the PACE programs’ behalf.

6. The Intus software predicts patients at high risk for hospitalizations, readmissions, and the onset of chronic diseases; seeks to reduce overall expenditures through early patient risk detection; and improves organizational performance through trend analysis and best practice identification.

7. By helping PACE programs harness their existing data to provide better care, Intus reduces administrative burden on providers and allows PACE programs to better focus on interacting with participants.

8. Intus Clients, who are health care providers, expect their electronic health records to be seamlessly integrated into Intus’ software without additional or manual effort on the part of the PACE programs themselves in order to reduce the burden on the Intus Clients’ clinical staff and care workers in using Intus’ services. Intus Clients cannot function without an EMR system.

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1 9. The parties have been litigating this case for nearly two years, and Intus has
2 continually tried to compromise with RTZ to resolve RTZ's unsupported concerns about its
3 intellectual property being compromised by Intus accessing Intus Clients' information PACECare.

4 10. Intus Clients capture and store their patients' electronic health data in electronic
5 health record programs, including on PACECare.

6 11. Intus Clients need Intus to be able to access the electronic health record data that the
7 Intus Clients store on PACECare on a regular and consistent basis.

8 12. Around April 2021, Intus contacted RTZ to request access to Intus Clients' health
9 records data stored on RTZ's PACECare system—data that RTZ provides to other vendors and
10 programs, but which it now refuses to provide to Intus.

11 13. From approximately June 2021 to September 2022, Intus obtained the electronic
12 health records data using automated scripts to extract the necessary data, with RTZ's knowledge.

13 14. Intus communicated with RTZ for years in an attempt to reach a solution that would
14 assuage RTZ's concerns about its intellectual property while allowing Intus to continue accessing
15 the data stored on PACECare belonging to the Intus clients. However, RTZ refused.

16 15. While Intus tried to negotiate a solution with RTZ, RTZ ramped up its efforts to
17 block Intus from accessing the PACECare system and to directly interfere with Intus and its
18 relationships with the Intus Clients.

19 16. Since March 15, 2024, due to RTZ's information blocking practices, Intus has been
20 completely locked out of access to PACECare and has had contracts terminated by five specific
21 clients to whose information Intus previously had authorized access.

22 17. Intus has already lost clients and risks losing more if RTZ's illegal information
23 blocking continues; RTZ's obstruction has additionally stifled numerous growth opportunities and
24 potential client acquisitions.

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1 I declare under penalty of perjury under the laws of the State of California that the contents
2 of this declaration are true and correct. Executed on the 18th day of April, 2025 in Chicago, Illinois.

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4 By:  _____
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